

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

Romelle Stevens

Case: 2:24-mj-30196

Assigned To : Unassigned

Assign. Date : 5/21/2024

CMP: SEAL MATTER (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 1, 2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section
18 U.S.C § 922(g)(1)

Offense Description
Felon in possession of a firearm.

This criminal complaint is based on these facts:
See Attached Affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: May 21, 2024

City and state: Detroit, Michigan


Complainant's signature

Jaclyn Kocis-Maniaci, Task Force Officer-ATF
Printed name and title


Judge's signature

Hon. Elizabeth A. Stafford, United States Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF
AN CRIMINAL COMPLAINT

I, Jaclyn Kocis-Maniaci, being first duly sworn, hereby state:

1. I am a police officer with the City of Detroit. I have been with the Detroit Police Department since 2003. I became a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) in January of 2017. During my career, I have been involved in numerous investigations involving firearms and narcotics resulting in successful federal and state prosecutions.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, review of reports by myself and/or other law enforcement agents, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. ATF is currently conducting a criminal investigation concerning Romelle STEVENS for violating 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm).

PROBABLE CAUSE

4. On May 1, 2024, Detroit Police Department (DPD) officers were on patrol in the area of Chalfonte and Schaefer in the city of Detroit. Officers observed a black 2017 Cadillac XT with tinted windows on all windows, front and back. Per the Law Enforcement Information Network (LEIN), the Cadillac did not have valid insurance. Officers activated their overhead lights to initiate a traffic stop. At this time, officers observed the Cadillac to have a defective driver side brake light.

5. Once the Cadillac XT pulled over, officers approached the car and observed open intoxicants inside the vehicle. The driver was detained due to the open intoxicants and not having a driver's license. The rest of the passengers were asked to exit the vehicle. The backseat passenger, Romelle STEVENS, was hesitant to step out of the vehicle and made numerous gestures during the stop. STEVENS eventually got out of the car and was placed in handcuffs.

6. Officers then searched the vehicle, and recovered a black Glock handgun, model 23, 40 caliber, containing multiple live rounds with a mounted light, on the back right passenger floor board, at the feet of where STEVENS had been sitting. A clear bottle of Jose Cuervo tequila was also recovered from inside the Cadillac.

7. On May 16, 2024, I contacted ATF Interstate Nexus Expert Special Agent Kara Klupacs and provided a verbal description of the Glock handgun recovered by Detroit Police officers on May 1, 2024. SA Kara Klupacs advised the firearm was manufactured outside of the state of Michigan, and therefore has traveled in and affected interstate commerce.

8. I reviewed a computerized criminal history and records for STEVENS, which included the following convictions:

- a. In 2016, STEVENS pleaded guilty in U.S. District Court for the Northern District of West Virginia to distribution of heroin in violation of 18 U.S.C. § 841(a)(1) and (b)(1)(C).
- b. In 2019, STEVENS pleaded guilty in U.S. District Court for the Eastern District of Michigan to felon in possession of a firearm, in violation of 18 U.S.C. § 922(g)(1). Case No. 18-cr-20776.

CONCLUSION

9. Based upon the aforementioned facts stated herein, there is probable cause to believe Romelle STEVENS, a convicted felon, aware of his felony convictions, did knowingly and intentionally possess a Glock, model 23 handgun, said firearm having affected interstate commerce, in violation of 18 U.S.C. 922(g)(1) (Felon in Possession of a Firearm). Said violation occurring on or about

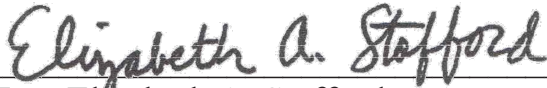
May 1, 2024, in the city of Detroit, in the County of Wayne, in the Eastern Judicial District of Michigan.

Respectfully submitted,



Jaclyn Kocis-Maniaci
Task Force Officer, ATF

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Hon. Elizabeth A. Stafford
United States Magistrate Judge

Dated: May 21, 2024